

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
DOCKET NO.: 15-13778

ALISSA FURTADO A/K/A BABY DIAS )

Plaintiff, )

v. )

**JURY TRIAL DEMANDED**

WOMEN AND INFANTS HOSPITAL )

OF RHODE ISLAND, JOHN DOE #1, )

JOHN DOE #2, JANE DOE #1, )

JANE DOE #2, JANE DOE #3 )

Defendants. )

**COMPLAINT AND JURY DEMAND**

1. The Plaintiff, Alissa Furtado, a/k/a Baby Dias (hereinafter "Alissa Furtado"), is an individual residing in Fall River, Bristol County, Massachusetts.
2. The Defendant, Women and Infants Hospital of Rhode Island (hereinafter "Women and Infants") is a Rhode Island Nonprofit Corporation with its principal place of business at 101 Dudley Street, Providence County, Providence, Rhode Island, 02905,.
3. The Defendant, John Doe #1, served as a medical doctor at all times herein relevant at Women and Infants.
4. The Defendant, John Doe #2, served as a medical doctor at all times herein relevant at Women and Infants.
5. The Defendant, Jane Doe #1, served as a nurse at all times herein relevant at Women and Infants.
6. The Defendant, Jane Doe #2, served as a nurse at all times herein relevant at Women and Infants.
7. The Defendant, Jane Doe #3, served as a nurse at all times herein relevant at Women and Infants.

8. Diversity of citizenship satisfies the jurisdictional requirements of this Court.
9. At all times relevant hereto, Alissa Furtado, was treated and cared for by the Defendants, at Women and Infants at 101 Dudley Street, Providence, RI, 02905, Providence County.
10. The Defendants, negligently and carelessly caused an infiltration of Alissa Furtado's left foot.
11. Said acts or omissions by the Defendants, constituted failure to possess and to exercise the degree of care and skill of the average qualified members of their professions.
12. As a direct and proximate result of the negligence of the Defendants, by their failure to possess and to exercise the degree of care and skill of the average qualified member of their professions, Alissa Furtado has scarring and other reoccurring issues.

WHEREFORE, Plaintiff Alissa Furtado, demands judgment against the Defendants, jointly and severally, in such an amount as a jury may deem proper, plus interest and costs.

**PLAINTIFF DEMANDS A TRIAL BY JURY**

Respectfully Submitted,



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DATED: December 1, 2015